

# EXHIBIT A

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

BRAYDEN STARK, JUDD OOSTYEN,  
KEVIN BLACK, and MARYANN OWENS,  
individually and on behalf of all others similarly  
situated,

## Plaintiffs,

V.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**CLRA VENUE DECLARATION OF  
SIMON S. GRILLE PURSUANT TO  
CALIFORNIA CIVIL CODE SECTION  
1780(d)**

Hon. Joseph C. Spero

1 I, Simon S. Grille, declare as follows:

2 1. I am a partner of Girard Sharp, LLP and counsel for Plaintiffs in this action. I am  
3 admitted to practice in California and before this Court and am a member in good standing of the  
4 State Bar of California.

5 2. This declaration is made pursuant to California Civil Code section 1780(d). I make  
6 this declaration based on my research of public records and upon personal knowledge and, if called  
7 upon to do so, could and would testify competently thereto.

8 3. I submit this declaration in support of the First Amended Class Action Complaint,  
9 which is based in part on violations of the Consumer Legal Remedies Act, California Civil Code  
10 section 1750 *et seq.*

11 4. The First Amended Class Action Complaint has been filed in the proper place for  
12 trial of this action.

13 5. Defendant Patreon has its principal place of business at 600 Townsend Street, Suite  
14 500, San Francisco, California 94103.

15 6. Patreon is headquartered and conducts substantial business within San Francisco  
16 County. In addition, a substantial part of the conduct, representations, and omissions giving rise to  
17 the violations of law alleged herein occurred in San Francisco County.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct.

20 Executed this 27th day of October 2022 in California.

22 /s/ Simon S. Grille  
23 Simon S. Grille